



Received & Inspected

JUN 30 2017

June 28, 2017

FCC Mailroom

VIA FEDERAL EXPRESS

Marlene H. Dortch, Secretary  
Federal Communications Commission  
9300 East Hampton Drive,  
Capital Heights, MD 20743

DOCKET FILE COPY ORIGINAL

Re: WC Docket Nos. 10-90 and 14-58 - FCC Form 481 -Kalama Telephone Company - Request for Confidential Treatment

Dear Ms. Dortch:

On behalf of Kalama Telephone Company it is requested that the attached material not be made routinely available for public inspection pursuant to 47 C.F.R. § 0.459 (a)(1).

Pursuant to 47 C.F.R. § 0.459(b), the information to be treated on a confidential basis is the financial information of the company. This information is being submitted in Docket No. 14-58 and pursuant to Commission rule.

As required by 47 C.F.R. § 0.459(b), the basis for the confidential treatment is that the information contains sensitive financial information concerning the company. The company is subject to competition and the information would provide competitors with valuable insight as to the company's plans and financial condition. The company is subject to competition in its downtown core by other carriers and disclosure of information could result in harm to the company by providing competitors with a competitive advantage and knowledge about the company's financial resources and plans. Similar information concerning the competitors is not available to the company. Thus, creating a competitive disadvantage.

The company routinely protects this type of information from disclosure by filing on a confidential basis when it is required to so file that information. The information is not available to the public. There has not been any previous disclosure of the information to third parties.

A redacted copy is included for the public record. Pursuant to the filing instructions, there is both an "original" and a copy, therefore, there are actually two copies of the redacted and two copies of the confidential versions. The confidential versions are contained in a separate envelope that is marked confidential.

Thank You you're your immediate attention to this matter

Sincerely

Rick Vitzthum  
Chief Financial Officer

No. of Copies rec'd  
List ABCDE

0+1

**Kalama Telephone Company**

290 N. First Street, P.O. Box 1068, Kalama, WA 98625 • Office: 360-673-2755 • FAX: 360-673-2757 • www.kalamatelephone.com

[REDACTED]	
<010> Study Area Code	522426
<015> Study Area Name	KALAMA TEL CO
<020> Program Year	2018
<030> Contact Name: Person USAC should contact with questions about this data	Rick Vitzthum
<035> Contact Telephone Number: Number of the person identified in data line <030>	3602642915 ext.
<039> Contact Email Address: Email of the person identified in data line <030>	rick@scattercreek.net
Form Type	54.313 and 54.422

Received &amp; Inspected

JUN 30 2017

FCC Mailroom

(200) Service Outage Reporting (Voice)  
Data Collection Form

FCC Form 481  
OMB Control No. 3060-0986/OMB Control No. 3060-0819  
July 2013

<010>	Study Area Code	522426
<015>	Study Area Name	KALAMA TEL CO
<020>	Program Year	2018
<030>	Contact Name - Person USAC should contact regarding this data	Rick Vitzthum
<035>	Contact Telephone Number - Number of person identified in data line <030>	3602642915 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	rick@scattercreek.net

**<210> For the prior calendar year, were there any reportable voice service outages?**

No

[illegible]

**(300) Unfulfilled Service Request  
Data Collection Form**

FCC Form 481  
OMB Control No. 3060-0986/OMB Control No. 3060-0819  
July 2013

<010>	Study Area Code	522426
<015>	Study Area Name	KALAMA TEL CO
<020>	Program Year	2018
<030>	Contact Name - Person USAC should contact regarding this data	Rick Vitzthum
<035>	Contact Telephone Number - Number of person identified in data line <030>	3602642915 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	rick@scattercreek.net

<300>	Unfulfilled service request (voice)	NA
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<310> Detail on attempts (voice)

Name of Attached Document

<320> Unfulfilled service request (broadband)

<320>	Unfulfilled service request (broadband)	NA
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<330> Detail on attempts (broadband)

Name of Attached Document

Form Number of Complaints per 1,000 customers  
Data Collection Form

PCC Form 401  
CARES Control No. 2020-0001/CARES Control No. 2020-0013  
July 2020

<010> Study Area Code

522426

<015> Study Area Name

KALAMA TEL CO

<020> Program Year

2018

<030> Contact Name - Person USAC should contact regarding this data

Rick Vitsthum

<035> Contact Telephone Number - Number of person identified in data line  
<030>

3602642915 ext.

<039> Contact Email Address - Email Address of person identified in data line  
<030>

richscattercreek.net

<400> Select from the drop-down list to indicate how you would like to report voice complaints (zero or greater) for voice telephony service in the prior calendar year for each service area in which you are designated an ETC for any facilities you own, operate, lease, or otherwise utilize. Offered only fixed voice

<410> Complaints per 1000 customers for fixed voice

0.0

<420> Complaints per 1000 customers for mobile voice

<430> Select from the drop-down list to indicate how you would like to report end-user customer complaints (zero or greater) for broadband service in the prior calendar year for each service area in which you are designated an ETC for any facilities you own, operate, lease, or otherwise utilize. Offered only fixed broadband

<440> Complaints per 1000 customers for fixed broadband

0.0

<450> Complaints per 1000 customers for mobile broadband

**(000) Compliance With Service Quality Standards and Consumer Protection Rules  
Data Collection Form**

PDC Form 483  
OMB Control No. 5060-0004/06-08 Control No. 5060-0013  
July 2013

<010> Study Area Code	522426
<015> Study Area Name	KALAMA TEL. CO
<020> Program Year	2010
<030> Contact Name - Person USAC should contact regarding this data	Rick Vitsthum
<035> Contact Telephone Number - Number of person identified in data line <030>	3602642915 ext.
<039> Contact Email Address - Email Address of person identified in data line <030>	rick@scattercreek.net
<500> Certify compliance with applicable service quality standards and consumer protection rules	Yes
<510> Descriptive document for Service Quality Standards & Consumer Protection Rules Compliance	522426 MA Line 0510 - Service Quality Standards & Consumer Protection Rules Compliances.pdf
<515> Certify compliance with applicable minimum service standards	

<b>(600) Functionality in Emergency Situations</b> <b>Data Collection Form</b>	<b>FCC Form 483</b> <b>OASIS Control No. 3090-0004/OASIS Control No. 3090-0619</b> <b>July 2003</b>
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<010> Study Area Code	522426
<015> Study Area Name	KALAMA, TN, CO
<020> Program Year	2018
<030> Contact Name - Person USAC should contact regarding this data	Rich Vittithum
<035> Contact Telephone Number - Number of person identified in data line <030>	3602642915 ext.
<039> Contact Email Address - Email Address of person identified in data line <030>	richvittithum@comcast.net
<600> Certify compliance regarding ability to function in emergency situations	Yes
<610> Descriptive document for Functionality in Emergency Situations	522446 MA Line 0610 - Statement demonstrating functionality in emergency situation.pdf

OMB Control No. 3060-0986/OMB Control No. 3060-0819  
July 2013

<010>	Study Area Code	522426
<015>	Study Area Name	KALAMA TEL CO
<020>	Program Year	2018
<030>	Contact Name - Person USAC should contact regarding this data	Rick Vitzezhum
<035>	Contact Telephone Number - Number of person identified in data line <030>	3602642915 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	rick@scattercreek.net

1/1/2017	
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[illegible]



## FCC Form 481

OMB Control No. 3060-0986/OMB Control No. 3060-0819  
July 2013

Study Area Code
<010>

Study Area Name
<015>

**KALAMA TEL CO**

2018

<020>	Program Year
-------	--------------

<030>	Contact Name - Person USAC should contact regarding this data	Rick Vitzthum
-------	---	---------------

3602642915 ext.	3602642915 ext.
<030> Contact Name - Person's name	<030> Contact Telephone Number - Number of person identified in data line <030>
<030> Contact Telephone Number - Number of person identified in data line <030>	<030> Contact Telephone Number - Number of person identified in data line <030>

<035>	Contact Telephone Number - Number of person reached in case line	rick@scattercreek.net
<039>	Contact Email Address - Email Address of person identified in data line	<030>

[illegible]

<010>	Study Area Code	522426
<015>	Study Area Name	KALAMA TEL CO
<020>	Program Year	2018
<030>	Contact Name - Person USAC should contact regarding this data	Rich Vitzthum
<035>	Contact Telephone Number - Number of person identified in data line <030>	3602642915 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	richvitzthum@telco.net
<040>	Reporting Carrier	Kalama Telephone Company
<041>	Holding Company	Scatter Creek Ltd.
<042>	Operating Company	Kalama Telephone Company

Affiliates	SAC	Doing Business As Company or Brand Designation

<01D>	Study Area Code	522426
<01S>	Study Area Name	KALAMA TEL CO
<02D>	Program Year	2018
<03D>	Contact Name - Person USAC should contact regarding this data	Rick Vitathum
<03S>	Contact Telephone Number - Number of person identified in data line <03D>	3602642915 ext.
<03S>	Contact Email Address - Email Address of person identified in data line <03D>	rick@cattarcreek.net
<90D>	Does the filing entity offer tribal land services? (Y/N)	NO

<910>	Tribal Land(s) on which ETC Serves	
<920>	Tribal Government Engagement Obligation	

<921>	
<922>	Feasibility and sustainability planning;
<923>	Marketing services in a culturally sensitive manner;
<924>	Compliance with Rights of way processes
<925>	Compliance with Land Use permitting requirements
<926>	Compliance with Facilities Siting rules
<927>	Compliance with Environmental Review processes
<928>	Compliance with Cultural Preservation review processes
<929>	Compliance with Tribal Business and Licensing requirements.

**(1000) Voice and Broadband Service Rate Comparability  
Data Collection Form**

FCC Form 481

OMB Control No. 3060-0986/OMB Control No. 3060-0819

July 2013

<010>	Study Area Code	522426
<015>	Study Area Name	KALAMA TEL CO
<020>	Program Year	2018
<030>	Contact Name - Person USAC should contact regarding this data	Rick Vitzthum
<035>	Contact Telephone Number - Number of person identified in data line <030>	3602642915 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	rick@scattercreek.net

&lt;1000&gt;

Voice services rate comparability certification

Yes

&lt;1010&gt;

Attach detailed description for voice services rate comparability compliance

522426 WA Line 1010 - VoiceServiceRateCompability.pdf

&lt;1020&gt;

Broadband comparability certification

Yes - Pricing is no more than the most recent applicable benchmark announced by the Wireline Competition Bureau

&lt;1030&gt;

Attach detailed description for broadband comparability compliance

522426 WA Line 1030 - BroadbandComparabilityCertification.pdf

**Name of Attached Document**

**Name of Attached Document**

**(1100) No Terrestrial Backhaul Reporting  
Data Collection Form**

FCC Form 481  
OMB Control No. 3060-0986/OMB Control No. 3060-0819  
July 2013

<010>	Study Area Code	522426
<015>	Study Area Name	KALAMA TEL CO
<020>	Program Year	2018
<030>	Contact Name - Person USAC should contact regarding this data	Rick Vitzthum
<035>	Contact Telephone Number - Number of person identified in data line <030>	3602642915 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	rick@scattercreek.net

<1100> Certify whether terrestrial backhaul options exist (Y/N)

Yes

<1130>

**(1200) Terms and Condition for Lifeline Customers**

**Lifeline**

**Data Collection Form**

FCC Form 481  
OMB Control No. 3060-0986/OMB Control No. 3060-0819  
July 2013

<010>	Study Area Code	522426
<015>	Study Area Name	KALAMA TEL CO
<020>	Program Year	2018
<030>	Contact Name - Person USAC should contact regarding this data	Rick Vitzthum
<035>	Contact Telephone Number - Number of person identified in data line <030>	3602642915 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	rick@scattercreek.net

522426 WA Line 1210-1223 Lifeline.pdf

**<1210> Terms & Conditions of Voice Telephony Lifeline Plans**

<1220> Link to Public Website HTTP

<1221> Information describing the terms and conditions of any voice telephony service plans offered to Lifeline subscribers, ☒

<1222> Details on the number of minutes provided as part of the plan, ☒

<1223> Additional charges for toll calls, and rates for each such plan. ☒

**(2005) Price Cap Carrier Additional Documentation**  
**Data Collection Form**  
*Including Rate-of-Return Carriers affiliated with Price Cap Local Exchange Carriers*

FCC Form 481  
 OMB Control No. 3060-0986/OMB Control No. 3060-0819  
 July 2013

**Price Cap Carrier Connect America ICC Support {47 CFR § 54.313(d)}**

<2016> Certification support used to build broadband

**Connect America Phase II Reporting {47 CFR § 54.313(e)}**

<2017A> Connect America Fund Phase II recipient?

<2017C> Total amount of Phase II support, if any, the price cap carrier used for capital expenditures in 2016.

<2018> Attach the number, names, and addresses of community anchor institutions to which the carrier newly began providing access to broadband service in the preceding calendar year - 54.313(e)(1)(ii)(A)

<2019> Recipient certifies that it bid on category one telecommunications and Internet access services in response to all FCC Form 470 postings seeking broadband service that meets the connectivity targets for the schools and libraries universal service support program for eligible schools and libraries located within any area in a census block where the carrier is receiving Phase II model-based support, and that such bids were at rates reasonably comparable to rates charged to eligible schools and libraries in urban areas for comparable offerings - 54.313(e)(1)(ii)(C)





Name of Attached Document Listing  
 Required Information

<010>	Study Area Code	522426
<015>	Study Area Name	KALAMA TEL CO
<020>	Program Year	2018
<030>	Contact Name - Person USAC should contact regarding this data	Rick Vitzthum
<035>	Contact Telephone Number - Number of person identified in data line <030>	3602642915 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	rick@scattercreek.net

Select from the drop down menu or check the boxes below to note compliance with 54.313(f)(1). Privately held carriers must ensure compliance with the financial reporting requirements set forth in 47 CFR 54.313(f)(2). I further certify that the information reported on this form and in the documents attached below is accurate.

**Progress Report on 5 Year Plan**  
 (3009) Carrier certifies to 54.313(f)(1)(iii)

Yes - Attach Certification

(3010A) Certification of Public Interest Obligations (47 CFR § 54.313(f)(1)(i))

(3010B) Please Provide Attachment

Name of Attached Document Listing Required Information

522426 WA Line 3010a - Certification of Public Interest Obligations.pdf

(3012A) Community Anchor Institutions (47 CFR § 54.313(f)(1)(ii))

(3012B) Please Provide Attachment

No - No New Community Anchors

Name of Attached Document Listing Required Information

(3013) Is your company a Privately Held ROR Carrier (47 CFR § 54.313(f)(2))

(Yes/No)

☒ ☐

(3014) If yes, does your company file the RUS annual report

(Yes/No)

☐ ☒

Please check these boxes to confirm that the attached PDF, on line 3017, contains the required information pursuant to § 54.313(f)(2) compliance requires:

(3015) Electronic copy of their annual RUS reports (Operating Report for Telecommunications Borrowers)

☐

(3016) Document(s) with Balance Sheet, Income Statement and Statement of Cash Flows

☐

(3017) If the response is yes on line 3014, attach your company's RUS annual report and all required documentation

Name of Attached Document Listing Required Information

(3018) If the response is no on line 3014, is your company audited?

(Yes/No)

☐ ☒

If the response is yes on line 3018, please check the boxes below to confirm your submission on line 3026 pursuant to § 54.313(f)(2), contains:

(3019) Either a copy of their audited financial statement; or (2) a financial report in a format comparable to RUS Operating Report for Telecommunications Borrowers

☐

(3020) Document(s) for Balance Sheet, Income Statement and Statement of Cash Flows

☐

(3021) Management letter and/or audit opinion issued by the independent certified public accountant that performed the company's financial audit.

☐

If the response is no on line 3018, please check the boxes below to confirm your submission on line 3026 pursuant to § 54.313(f)(2), contains:

(3022) Copy of their financial statement which has been subject to review by an independent certified public accountant; or 2) a financial report in a format comparable to RUS Operating Report for Telecommunications Borrowers

☒

(3023) Underlying information subjected to a review by an independent certified public accountant

☒

(3024) Underlying information subjected to an officer certification.

☒

(3025) Document(s) with Balance Sheet, Income Statement and Statement of Cash Flows

☒

(3026) Attach the worksheet listing required information

Name of Attached Document Listing Required Information

522426 WA Line 3022 - Copy of Financial Statement.pdf, 522426 WA Line 3024 - Information subjected to an officer certification.pdf



OMB Control No. 3060-0085/OMB Control No. 3060-0089  
July 2013

FCC Form 301  
OMB Control No. 3060-0085/OMB Control No. 3060-0089  
July 2013

OMB Control No. 3060-0085/OMB Control No. 3060-0089  
July 2013

<010>	Study Area Code	522426
<015>	Study Area Name	KALAMA TEL CO
<020>	Program Year	2018
<030>	Contact Name - Person USAC should contact regarding this data	Rick Vitzhum
<035>	Contact Telephone Number - Number of person identified in data line <030>	3602642915 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	rickagatt@creek.net

Financial Data Summary	
(3027) Revenue	
(3028) Operating Expenses	
(3029) Net Income	
(3030) Telephone Plant in Service (TPIS)	
(3031) Total Assets	
(3032) Total Debt	
(3033) Total Equity	
(3034) Dividends	

<010>	Study Area Code	922426
<015>	Study Area Name	KALAMIA TRL CO
<020>	Program Year	2018
<030>	Contact Name - Person USAC should contact regarding this data	Rich Vitsthum
<035>	Contact Telephone Number - Number of person identified in data line <030>	1602443515 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	rick@ecattarcreek.net

#### 4005 Rural Broadband Experiment

Authorized Rural Broadband Experiment (RBE) recipients must address the certification for public interest obligations, provide a list of newly served community anchor institutions, and provide a list of locations where broadband has been deployed.

#### Public Interest Obligations – FCC 14-98 (paragraphs 26-29, 78)

Please address Line 4001 regarding compliance with the Commission's public interest obligations. All RBE participants must provide a response to Line 4001.

4001. Recipient certifies that it is offering broadband to the identified locations meeting the requisite public interest obligations consistent with the category for which they were selected, including broadband speed, latency, usage capacity, and rates that are reasonably comparable to rates for comparable offerings in urban areas?

#### Community Anchor Institutions – FCC 14-98 (paragraph 79)

4003a. RBE participants must provide the number, names, and addresses of community anchor institutions to which they newly deployed broadband service in the preceding calendar year. On this line, please respond (yes – attach new community anchors, no – no new anchors) to indicate whether this list will be provided.

If yes to 4003A, please provide a response for 4003B.

4003b. Provide the number, names and addresses of community anchor institutions to which the recipient newly began providing access to broadband service in the preceding calendar year.

Name of Attached Document Listing Required Information

#### Broadband Deployment Locations – FCC 14-98 (paragraph 80)

4004a. Attach a list of geocoded locations to which broadband has been deployed as of the June 1st immediately preceding the July 1st filing deadline for the FCC Form 481.

Name of Attached Document Listing Required Information

4004b. Attach evidence demonstrating that the recipient is meeting the relevant public service obligations for the identified locations. Materials must at least detail the pricing, offered broadband speed and data usage allowances available in the relevant geographic area.

Name of Attached Document Listing Required Information



<010> Study Area Code	522426
<015> Study Area Name	KALAMA TEL CO
<020> Program Year	2018
<030> Contact Name - Person USAC should contact regarding this data	Rick Vitsthum
<035> Contact Telephone Number - Number of person identified in data line <030>	3602642915 ext.
<039> Contact Email Address - Email Address of person identified in data line <030>	rick@scattercreek.net

TO BE COMPLETED BY THE REPORTING CARRIER, IF THE REPORTING CARRIER IS FILING ANNUAL REPORTING ON ITS OWN BEHALF:

Certification of Officer as to the Accuracy of the Data Reported for the Annual Reporting for CAF or LI Recipients	
I certify that I am an officer of the reporting carrier; my responsibilities include ensuring the accuracy of the annual reporting requirements for universal service support recipients; and, to the best of my knowledge, the information reported on this form and in any attachments is accurate.	
Name of Reporting Carrier: KALAMA TEL CO	
Signature of Authorized Officer: CERTIFIED ONLINE	Date 06/27/2017
Printed name of Authorized Officer: Rick Vitsthum	
Title or position of Authorized Officer: Chief Financial Officer	
Telephone number of Authorized Officer: 3602642915 ext.	
Study Area Code of Reporting Carrier: 522426	Filing Due Date for this form: 07/03/2017
Persons willfully making false statements on this form can be punished by fine or forfeiture under the Communications Act of 1934, 47 U.S.C. §§ 502, 503(b), or fine or imprisonment under Title 18 of the United States Code, 18 U.S.C. § 1001.	

<010> Study Area Code	522426
<015> Study Area Name	KALANA TEL CO
<020> Program Year	2018
<030> Contact Name - Person USAC should contact regarding this data	Rick Vitzthum
<035> Contact Telephone Number - Number of person identified in data line <030>	3602642915 ext.
<039> Contact Email Address - Email Address of person identified in data line <030>	rick@scattercreek.net

TO BE COMPLETED BY THE REPORTING CARRIER, IF AN AGENT IS FILING ANNUAL REPORTS ON THE CARRIER'S BEHALF:

Certification of Officer to Authorize an Agent to File Annual Reports for CAF or LI Recipients on Behalf of Reporting Carrier	
I certify that (Name of Agent) is authorized to submit the information reported on behalf of the reporting carrier. I also certify that I am an officer of the reporting carrier my responsibilities include ensuring the accuracy of the annual data reporting requirements provided to the authorized agent and, to the best of my knowledge, the reports and data provided to the authorized agent is accurate.	
Name of Authorized Agent:	
Name of Reporting Carrier:	
Signature of Authorized Officer:	Date:
Printed name of Authorized Officer:	
Title or position of Authorized Officer:	
Telephone number of Authorized Officer:	
Study Area Code of Reporting Carrier:	Filing Due Date for this form:
Persons willfully making false statements on this form can be punished by fine or forfeiture under the Communications Act of 1934, 47 U.S.C. §§ 502, 503(b), or fine or imprisonment under Title 18 of the United States Code, 18 U.S.C. § 1001.	

TO BE COMPLETED BY THE AUTHORIZED AGENT:

Certification of Agent Authorized to File Annual Reports for CAF or LI Recipients on Behalf of Reporting Carrier	
I, as agent for the reporting carrier, certify that I am authorized to submit the annual reports for universal service support recipients on behalf of the reporting carrier; I have provided the data reported herein based on data provided by the reporting carrier; and, to the best of my knowledge, the information reported herein is accurate.	
Name of Reporting Carrier:	
Name of Authorized Agent Firm:	
Signature of Authorized Agent or Employee of Agent:	Date:
Name of Authorized Agent Employee:	
Title or position of Authorized Agent or Employee of Agent:	
Telephone number of Authorized Agent or Employee of Agent:	
Study Area Code of Reporting Carrier:	Filing Due Date for this form:
Persons willfully making false statements on this form can be punished by fine or forfeiture under the Communications Act of 1934, 47 U.S.C. §§ 502, 503(b), or fine or imprisonment under Title 18 of the United States Code, 18 U.S.C. § 1001.	

## **Attachments**

FCC Form 481  
OMB Control No. 3060-0986/OMB Control No. 3060-0819  
July 2013

 <015> Study Area Name |

<020>	Program Year
-------	--------------

<030>	Contact Name - Po
-------	-------------------

<035>	Contact Telephone Number - Number of person identified in data

<039>	Contact Email Address - Email Address of person identified in data

-----> **Server address** **IP** **Port** **URI** **Method** **Response** **Time** **Size** **Code** **Header** **Body** **Comment**

<701>	Residential Local Service Charge Effective Date

<702> Single State-wide Residential Local Service Charge

100

<703>

[illegible]

**\$22426**

**KALAMA TEL 00**

2018

**Rick Vitzthum**

3602642915 ext.

**rickscattercreek.net**

100

<711>

**(300) Operating Companies  
Data Collection Form**

FCC Form 481  
OMB Control No. 3060-0986/OMB Control No. 3060-0819  
July 2013

<010>	Study Area Code	522426
<015>	Study Area Name	KALAMA TEL CO
<020>	Program Year	2018
<030>	Contact Name - Person USAC should contact regarding this data	Rick Vitzthum
<035>	Contact Telephone Number - Number of person identified in data line <030>	3602642915 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	rick@scattercreek.net
<810>	Reporting Carrier	Kalama Telephone Company
<811>	Holding Company	Scatter Creek Ltd.
<812>	Operating Company	Kalama Telephone Company

<813>		<a1>		<a2>		<a3>	
		Affiliates		SAC		Doing Business As Company or Brand Designation	
Tenino Telephone Company				522446		Tenino Telephone Company	
Scatter Creek InfoNet						Scatter Creek InfoNet	
TenKal Company						Scatter Creek Communications	



**Kalama Telephone Company  
FCC Form 481 (July 2017), Line 510  
Description of Processes and Procedures to Ensure  
Compliance with Service Quality Standards and  
Consumer Protection Rules Per Instructions  
for Completing FCC Form 481**

This document details the processes and procedures that Kalama Telephone Company (the "Company") follows to ensure compliance with service quality standards and consumer protections rules as set forth in the Instructions for Completing FCC Form 481.

For service quality standards that are affected by plant issues, the Company engineers and installs its plant and other facilities in such a way as to ensure, to the greatest extent possible, compliance with service quality standards that exist at the time that the plant and facilities are constructed. Plant is augmented, upgraded and/or reconfigured as service needs evolve.

In addition, Company employees are periodically briefed on issues involving service quality standards and consumer protection rules. In particular, if any set of issues appear to be prevalent, employees are given briefings on how to handle such issues. An example is the call completion problems that have arisen over the last several years and the customer calls that are generated as a result. Although this is not a service quality problem caused by the Company, it does affect customers of the Company and, therefore, deserves the attention of the Company employees.

The Company also periodically reviews its operating procedures to be sure that those operating procedures are in compliance with service quality standards and that the operating procedures are not in violation of consumer protection rules. If questions arise, legal counsel is sought as needed.

If a complaint pertaining to the Company's compliance with service quality standards or consumer protection rules is received by the Company, the complaint is promptly investigated, the matter tracked and any corrective action noted. This process ensures that issues involved in the matter are addressed and corrections made, if needed. It should be noted that the Company has received no customer complaints in the past five years regarding service quality standards or consumer protection rules as they relate to the service offered by the Company other than call completion issues, which, as noted above, are not caused by the Company.

**Kalama Telephone Company  
FCC Form 481 (July 2017), Line 610  
Statement Describing Ability to Function  
in Emergency Situations Per Instructions  
for Completing FCC Form 481**

At line 600 of FCC Form 481, Kalama Telephone Company (the "Company") certified that it is able to function in emergency situations as set forth in 47 C.F.R § 54.202(a)(2). This means that the Company has a reasonable amount of back-up power to ensure functionality without an external source, is able to reroute traffic around damaged facilities, and is capable of managing traffic spikes resulting from emergency situations. This statement describes how the Company is prepared to provide continued service in an emergency situation.

The Company has back-up batteries that provide service for its central office during a commercial power outage, with the capacity to function for at least eight hours. In addition, there is a natural gas powered generator available which can operate as long as the natural gas supply is not interrupted. The generator will also operate with propane in case the natural gas supply is interrupted. The generator automatically starts during any power outage or spike in commercial power that powers the central office and business office. Further, the Company has propane generators installed at all but two of its remote sites. The two remote sites that do not have an install generator are supplied with a portable generator in case of a power outage.

The Company has route redundancy and diversity for interexchange access service, E-911 trunking and SS7 signaling circuits.

The Company's outside plant is primarily buried and, thus, protected from most weather events. The Company's central office switch capacity is engineered to accommodate traffic spikes, and its interexchange facilities also have the capacity to provide additional circuits for interexchange carriers should the need arise.

In the case of isolated groups of customers that may suffer damage due to a cable cut, the Company maintains sufficient staff and other resources to be able to put customers back in service in a very short amount of time. The Company's emergency service equipment is located within its exchange and requires very little time to dispatch.

**Kalama Telephone Company  
FCC Form 481 (July 2017), Line 1010  
Voice Services Comparability Report  
for Completing FCC Form 481**

Pursuant to 47 C.F.R. § 54.313 (a) (10) Kalama Telephone Company (Kalama) is in compliance with the requirement that voice services is no more than two standard deviations above the national average urban rate for voice service of \$49.51 as specified in Public Notice DA 17-167 issued on February 14, 2017. Kalama's current total local end-user rate<sup>1</sup> of \$18.00 (which includes a local fee of \$18.00, no mandated state fees and no mandatory extended area service charges) is not above the standard deviation as specified in the USF/ICC Transformation Order.<sup>2</sup>

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<sup>1</sup> Local End User Rate as defined in USF/ICC Transformation Order 26 FCC Rcd at 17751, Para. 238

<sup>2</sup> USF/ICC Transformation Order, 26 FCC Rcd at 17694, Para. 84 (footnote included) "The standard deviation is a measure of dispersion. The sample standard deviation is the square root of the sample variance. The sample variance is calculated as the sum of the squared deviations of the individual observations in the sample of data from the sample average divided by the total number of observations in the sample minus one. In a normal distribution, about 68 percent of the observations lie within one standard deviation above and below the average and about 95 percent of the observations lie within two standard deviations above and below the average."

**Kalama Telephone Company  
FCC Form 481 (July 2017), Line 1030  
Broadband Comparability Certification Report  
for Completing FCC Form 481**

Pursuant to 47 C.F.R. § 54.313 (a) (12) Kalama Telephone Company (Kalama) certifies that it is in compliance with the requirement that Kalama's broadband service offering for 10 Mbps download and 1 Mbps upload is less than the national average for such service. The national average for 10 Mbps download and 1 Mbps upload with unlimited usage allowance as specified in Public Notice DA 16-362 issued on April 5, 2016 is \$75.20 per month. The national average for 10 Mbps download and 1 Mbps upload with unlimited usage allowance as specified in Public Notice DA 17-167 issued on February 14, 2017 is \$77.98 per month. Kalama's current broadband service rate that meets or exceeds the 10 Mbps download and 1 Mbps upload with unlimited usage requirement is \$59.95.